The Office action asserts that Nishigawa teaches pixel electrodes arranged in an area that facilitates flexing, which is identified as label #10 of Nishigawa's FIG. 3(b) by the Examiner. The applicant respectfully traverses this assertion, because Nishigawa's FIG. 3(b) clearly illustrates the *pixel elements* 1a, 2a, 3a, 4a, arranged in the area that is identified as label #11 by the Examiner. That is, Nishigawa specifically teaches configuring the substrate so that flexing occurs *between* the pixel elements, whereas the applicant specifically claims configuring the substrate so that flexing occurs at the pixel elements.

Because Nishigawa specifically teaches flexing the substrate between the pixel elements, and the applicant specifically claims flexing the substrate at the pixel elements, the applicant respectfully requests the Examiner's reconsideration of the rejection of claims 1-3, 6, 8-11, and 13 under 35 U.S.C. 102(e) over Nishizawa, claims 4 and 5 under 35 U.S.C. 103(a) over Nishizawa, and claims 7 and 12 under 35 U.S.C. 103(a) over Nishizawa and Shanks.

In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the present application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Robert M. McDermott, Esq

Reg. No. 41,508 804-493-0707

CERTIFICATE OF MAILING OR TRANSMISSION

It is hereby certified that, on the date shown below, this correspondence is being:

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